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Attorney for Defendant Eric Lee Flores

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA,

Case No. 3:16-CR-00051-25-BR

Plaintiff,

v.

**MOTION FOR A
CONTINUANCE
OF TRIAL DATE**

ERIC LEE FLORES,

Defendant.

IN COMPLIANCE with the conferral order, Eric Lee Flores by and through his attorney, Ernest Warren, Jr., conferred with the government before filing this motion and respectfully requests that this Honorable Court continue the trial date for the above-captioned case from the date now scheduled September 7, 2016 to December 6, 2016.

FURTHERMORE, the defendant, shall agree that the period of time reflected in this continuance is excludable pursuant to 18 U.S.C. § 3161(h)(7) from the time period within which trial must commence as set forth in 18 U.S.C. § 3161(c)(1).

/S/ Ernest Warren, Jr.

Ernest Warren, Jr. OSB No. 891384
Attorney for defendant

CERTIFICATE OF SERVICE

I hereby certify that I have served a certified true copy of the MOTION TO CONTINUE TRIAL DATE AND DECLARATION IN SUPPORT OF MOTION TO CONTINUE TRIAL DATE in the attached matter upon the parties listed below by notice of electronic filing using the CM/ECF System as follows:

Ethan D. Knight
Craig J. Gabriel
Geoffrey A. Barrow
U.S. Attorney's Office
District of Oregon
1000 S.W. Third Avenue
Suite 600
Portland, OR 97204
503-727-1118
Fax: 503-727-1117

and filed the original with the Court on the date listed below.

DATED this 8 day of April, 2016.

WARREN & SUGARMAN

/s/Ernest Warren, Jr.
Ernest Warren, Jr. OSB No. 891384
Attorney for Defendant